

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,
Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

**UNOPPOSED JOINT URGENT MOTION OF THE AD HOC GROUP OF PREPA
BONDHOLDERS, ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., SYNCORA GUARANTEE, INC., AND U.S. BANK NATIONAL
ASSOCIATION AS PREPA BOND TRUSTEE TO EXTEND THE DEADLINES FOR
ALL PARTIES TO FILE OPPOSITIONS AND REPLIES TO DAUBERT MOTIONS
AND MOTIONS IN LIMINE**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

The Ad Hoc Group of PREPA Bondholders (the “Ad Hoc Group”), U.S. Bank National Association in its capacity as the trustee for PREPA bonds (the “Trustee”), Assured Guaranty Corp. and Assured Guaranty Municipal Corp. (“Assured”), and Syncora Guarantee Inc. (“Syncora,” and together with the Ad Hoc Group, Assured, and the PREPA Bond Trustee, the “Bondholders”) respectfully submit this limited unopposed joint urgent motion (“Urgent Motion”) requesting the entry of an order, substantially in the form annexed hereto as **Exhibit A** (the “Proposed Order”), extending the deadline for all parties to file oppositions to Daubert motions and motions *in limine* from June 9, 2023 to June 13, 2023 and extending the deadline for all parties to file replies in support of Daubert motions and motions *in limine* from June 16, 2023 to June 20, 2023.

RELIEF REQUESTED AND BASIS FOR SUCH RELIEF

1. Under the *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (the “Confirmation Procedures Order”), the parties are required to file any oppositions to Daubert motions and motions *in limine* by June 9, 2023 and any replies in support of Daubert motions and motions *in limine* by June 16, 2023. Confirmation Procedures Order ¶ 3.

2. In light of the Claim Estimation proceeding taking place this week, the Bondholders reached out to all parties who have filed any Daubert motions and/or motions *in limine* to inquire whether they would be amenable to extending the deadline for all parties to file oppositions to Daubert motions and motions *in limine* from June 9, 2023 to June 13, 2023 and extending the deadline for all parties to file replies in support of Daubert motions and motions *in limine* from June 16, 2023 to June 20, 2023.

3. Such extensions would not impact any other deadline in this case.

4. All parties affected by these deadlines have informed the Bondholders they have no objection to the requested extensions as set forth in this Urgent Motion.

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico
June 5, 2023

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EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.²

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

**ORDER GRANTING UNOPPOSED JOINT URGENT MOTION OF THE AD HOC
GROUP OF PREPA BONDHOLDERS, ASSURED GUARANTY CORP., ASSURED
GUARANTY MUNICIPAL CORP., SYNCORA GUARANTEE, INC., AND U.S. BANK
NATIONAL ASSOCIATION AS PREPA BOND TRUSTEE TO EXTEND THE
DEADLINES FOR ALL PARTIES TO FILE OPPOSITIONS AND REPLIES TO
DAUBERT MOTIONS AND MOTIONS IN LIMINE**

² The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Upon consideration of the *Unopposed Joint Urgent Motion of the Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., Syncora Guarantee Inc., and U.S. Bank National Associations as PREPA Bond Trustee to Extend the Deadlines for All Parties to File Oppositions and Replies to Daubert Motions and Motions in Limine* (Docket Entry No. _____ in Case No. 17-bk-3238) (the “Urgent Motion”) and the relief requested and basis for such relief set forth in the Urgent Motion, the Court hereby finds that good and sufficient cause exists for granting of the Bondholders’ requested relief.

Accordingly, it is hereby **ORDERED THAT:**

1. The Urgent Motion is **GRANTED** as set forth herein.
2. The deadline by which all parties must file any oppositions to Daubert motions and motions *in limine* is hereby extended from June 9, 2023 to **June 13, 2023**.
3. The deadline by which all parties must file any file replies in support of Daubert motions and motions *in limine* is hereby extended from June 16, 2023 to **June 20, 2023**.

SO ORDERED

Dated: June ____, 2023
San Juan, Puerto Rico

HONORABLE LAURA TAYLOR SWAIN
United States District Judge